

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**V.**

**ROY W. HILL, ERIC N. SHELLY,  
CLEAN ENERGY TECHNOLOGY  
ASSOCIATION, INC., and  
FREEDOM IMPACT CONSULTING, LLC,**

### Defendants.

~~~~~

**Civil Action No.: 6:23-cv-321**

**FILED UNDER SEAL**

**CERTIFICATION PURSUANT TO FED. R. CIV. P. 65(b)**

I, Eric Werner, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. §1746, that the following is true and correct, that this declaration is made on my personal knowledge, and that I am competent to testify as to the matters stated herein.

1. I am an attorney licensed to practice in the State of Texas.
2. I have worked in the Enforcement Division of the United States Securities and Exchange Commission (“SEC”) for 25 years. I currently serve as the Associate Regional Director for Enforcement in the SEC’s Fort Worth Regional Office. I am responsible for supervising the office’s enforcement activities, including the investigation of suspected securities law violations and the litigation of SEC enforcement actions in the federal courts.
3. Since 1998, the Fort Worth Office has sought and obtained emergency and/or *ex parte* relief for the protection of defrauded investors in more than 112 cases. *See* **Exhibit A**, attached hereto (listing cases).
4. In several of those cases, including ones in which an asset freeze was granted *ex*

*parte*, one or more defendants or relief defendants violated the asset freeze.

5. Based on those experiences and the information I have been provided about the Defendants named herein, including the specific facts set forth in the accompanying Memorandum and Brief in Support of Plaintiff's Application for Preliminary Injunction, *Ex Parte* Temporary Restraining Order, Asset Freeze, Appointment of Receiver, and Other Ancillary Relief ("Brief"), I believe that irreparable injury and loss is likely to occur if the Court requires notice and a hearing.

6. In this case, the SEC has made no effort to give notice to Defendants Roy W. Hill ("Hill"), Eric N. Shelly ("Shelly"), Clean Energy Technology Association, Inc. ("CETA"), and Freedom Impact Consulting, LLC ("FIC") (collectively, "Defendants"). Doing so would give Defendants an opportunity—before the Court enters the temporary restraining order, the asset freeze, and other emergency relief the SEC is seeking—to dissipate, hide, encumber, or place outside the Court's jurisdiction assets they obtained in the fraudulent scheme described in the SEC's Complaint and further described in the Brief filed herewith.

SIGNED this 1<sup>st</sup> day of May, 2023 at Fort Worth, Texas.



Eric Werner

**EXHIBIT A**  
**CERTIFICATION UNDER FED. R. CIV. P. 65(b)**

- (1) *SEC v. Mauricio Chavez, et al.*, 4:22-cv-3359 (S.D. Tex. 2022) (Hanan, J.) (granting TRO, asset freeze, preservation of documents, sworn accounting, expedited discovery, alternative service, and order appointing receiver);
- (2) *SEC v. Boron Capital, LLC, et al.*, 5:22-cv-114-C (N.D. Tex. 2022) (Cummings, J.) (granting TRO, asset freeze, preservation of documents, expedited discovery, sworn accountings, alternative service, and order appointing receiver);
- (3) *SEC v. Perez, et al.*, 7:21-cv-00238-DC-RCG (W.D. Tex. 2021) (Counts, J.) (granting TRO, asset freeze, preservation of documents, sworn accountings, passport surrender, and expedited discovery);
- (4) *SEC v. Akazoo S.A.*, 1:20-cv-08101-AKH (S.D.N.Y. 2020) (Hellerstein, J.) (granting asset freeze, accounting and repatriation of assets);
- (5) *SEC v. Meta 1 Coin Trust, et al.*, No. 1:20-cv-00273-RP (W.D. Tex. 2020) (Pittman, J.) (granting TRO, asset freeze, and orders requiring accounting, document preservation, and expedited discovery);
- (6) *SEC v. One or More Unknown Traders in the Securities of Anadarko Petroleum Corp.*, 19-cv-03785-GHW (S.D.N.Y. 2019) (Woods, J.) (granting TRO, asset freeze, and orders requiring preservation of documents, alternative service, and expedited discovery);
- (7) *SEC v. Kent R.R. Whitney, et al.*, 8:19-cv-499 (C.D. Cal. 2019) (Selna, J.) (granting TRO, asset freeze, and orders prohibiting destruction of documents, granting expedited discovery, passport surrender, accounting, and appointment of receiver);
- (8) *SEC v. Carter, et al.*, No. 4:19-cv-100-ALM-KPJ (E.D. Tex. 2019) (Jordan, J.) (granting TRO, asset freeze, and orders requiring accounting and preservation of documents);
- (9) *SEC v. Gallagher, et al.*, No. 3:19-cv-00575-G (N.D. Tex. 2019) (Boyle, J.) (granting TRO, asset freeze, appointment of receiver, and orders for accounting, document preservation, expedited discovery, and alternative service);
- (10) *SEC v. AriseBank, et al.*, No.18-cv-0186-M (N.D. Tex. 2018) (Lynn, C.J.) (granting TRO, asset freeze, and passport surrender);
- (11) *SEC v. Faulkner, et al.*, No. 3:17-cv-2405-B (N.D. Tex. 2017) (Boyle, J.) (granting TRO, asset freeze, and orders requiring document preservation, accounting, alternative service and expedited discovery);
- (12) *SEC v. Faulkner, et al.*, No. 3:16-cv-1735-D (N.D. Tex. 2017) (Fitzwater, J.) (granting TRO, asset freeze, appointment of receiver, and orders for document preservation and expedited discovery);
- (13) *SEC v. Thurman P. Bryant, III, et al.*, No. 4:17-cv-336-ALM (E.D. Tex. 2017) (Mazzant, J.) (granting TRO, asset freeze, preliminary injunction, appointment of receiver, document preservation order, order requiring accounting);
- (14) *SEC v. 4D Circle, LLC, et al.*, No. 4:17-cv-321-Y (N.D. Tex. 2017) (Means, J.) (granting preliminary injunction and order appointing receiver);
- (15) *SEC v. Patrick O. Howard, et al.*, No. 3:17-cv-420-L (N.D. Tex. 2017) (Lindsay, J.) (granting asset freeze, TRO, preliminary injunction, preservation of documents, accounting, expedited discovery, and order appointing receiver);
- (16) *SEC v. Ash Narayan, et al.*, No. 3:16-cv-1417-M (N.D. Tex. 2016) (Lynn, J.) (granting TRO, asset freeze, and orders for preservation of documents, expedited discovery, and

- other emergency relief);
- (17) *SEC v. Crumbley, Jr., et al.*, No. 3:16-cv-0172-L (N.D. Tex. 2016) (Lindsey, J.) (granting asset freeze, document preservation, accounting, expedited discovery, alternative service and order appointing receiver);
  - (18) *SEC v. Ascenergy LLC, et al.*, No. 2:15-cv-01974-GMN-PAL (Nev. 2015) (Navarro, J.) (granting asset freeze, accounting, and preservation of documents);
  - (19) *SEC v. Sethi Petroleum, LLC, et al.*, No. 4:15-cv-338-ALM (E.D. Tex. 2015) (Mazzant, J.) (granting asset freeze, document preservation, accounting, expedited discovery and order appointing receiver);
  - (20) *SEC v. Brown, et al.*, No. 6:15-cv-119-WSS (W.D. Tex. 2015) (Smith, J.) (granting asset freeze, accounting, preserving documents and other emergency relief);
  - (21) *SEC v. Robert A. Helms, et al.*, No. 1:13-cv-01036-LY (W.D. Tex. 2013) (Yeakel, J.) (granting order freezing assets, requiring an accounting, preservation of documents and other emergency relief; granting order appointing receiver);
  - (22) *SEC v. Marco A. Ramirez, et al.*, No. 7:13-cv-531 (S.D. Tex. 2013) (Crane, J.) (granting order freezing assets, appointment of receiver, requiring an accounting, preservation of documents and other emergency relief);
  - (23) *SEC v. Kevin G. White, et al.*, No. 4:13-cv-00383-RAS-DDB (E.D. Tex. 2013) (Schell, J.) (granting order freezing assets, requiring an accounting, preservation of documents and other emergency relief; granting order appointing receiver);
  - (24) *SEC v. Bergin, et al.*, No. 3:13-cv-01940-M (N.D. Tex. 2013) (Lynn, C.J.) (granting order freezing assets, requiring preservation of documents and authorizing expedited discovery);
  - (25) *SEC v. Investment Intelligence Corporation PTY LLC, et al.*, No. 1:12-cv-00863-LY (W.D. Tex. 2012) (Yeakel, J.) (granting order freezing assets, granting temporary restraining order and other emergency relief);
  - (26) *SEC v. Usee, Inc., et al.*, No. 3:12-cv-01325-M (N.D. Tex. 2012) (Lynn, J.) (granting order freezing assets, requiring accounting, requiring preservation of documents and authorizing expedited discovery);
  - (27) *SEC v. Evolution Capital Advisors, LLC, et al.*, No. H-11-2945 (S.D. Tex. 2011) (Miller, J.) (granting asset freeze, and appointing receiver);
  - (28) *SEC v. Temme, et al.*, No. 4:11-cv-655 (E.D. Tex.) (Schneider, J.) (granting temporary restraining order, expedited discovery and appointing receiver);
  - (29) *SEC v. Bjork, et al.*, No. 4:11-cv-02830 (S.D. Tex.) (Ellison, J.) (granting temporary restraining order, order requiring an accounting, expedited discovery, and order appointing receiver);
  - (30) *SEC v. Blackwell, et al.*, No. 3:11-cv-234-L (N.D. Tex.) (Lindsay, J.) (granting temporary restraining order);
  - (31) *SEC v. Smith, et al.*, No. 4:10-cv-613-MHS-ALM (E.D. Tex.) (Snyder, J.) (granting temporary restraining order, orders requiring asset freeze, accounting, preservation of documents and expedited discovery);
  - (32) *SEC v. Ginder, et al.*, No. 4:10-cv-02867 (S.D. Tex. 2010) (Sim, J.) (granting agreed orders appointing receiver and requiring an accounting);
  - (33) *SEC v. Petrogas Overseas Trading, LP, et al.*, No. 4:10-cv-395-A (N.D. Tex. 2010) (McBryde, J.) (granting TRO, asset freeze, and orders requiring accounting, prohibiting document destruction, passport surrender, repatriation of assets, and authorizing

- expedited discovery);
- (34) *SEC v. American Settlement Associates, LLC, et al.*, No. 4:10-cv-912 (S.D. Tex. 2010) (Lake, J.) (granting asset freeze, receiver, and other emergency relief);
  - (35) *SEC v. Alan Todd May, et al.*, No. 3:10-cv-425-L (N.D. Tex. 2010) (Lindsey, J.) (granting asset freeze, receiver, and other ancillary relief);
  - (36) *SEC v. Striker Petroleum, LLC, et al*, No. 3:09-cv-2304-D (N.D. Tex. 2009) (Fitzwater, J.) (granting agreed order freezing assets and appointing receiver);
  - (37) *SEC v. Harris, et al.*, No. 3:09-cv-1809-M (N.D. Tex. 2009) (Boyle, J.) (granting agreed order freezing assets and appointing receiver);
  - (38) *SEC v. Saleh, et al.*, No. 3:09-cv-1778-M, (N.D. Tex. 2009) (Lynn, J.) (granting order freezing assets, requiring an accounting, requiring preservation of documents, and authorizing expedited discovery);
  - (39) *SEC v. Poetter, et al.*, No. 6:09-cv-398, (E.D. Tex. 2009) (Schneider, J.) (granting appointment of receiver and expedited discovery);
  - (40) *SEC v. Titan Wealth Management, et al.*, No. 4:09-cv-418 (E.D. Tex. 2009) (Schneider, J.) (granting temporary restraining order, freezing assets, requiring an accounting, requiring preservation of documents, authorizing expedited discovery and granting other equitable relief);
  - (41) *SEC v. Randall, et al.*, No. 3:09-cv-1465-O (N.D. Tex. 2009) (O'Connor, J.) (granting temporary order, order freezing assets, requiring accounting, requiring preservation of documents, and authorizing expedited discovery and order appointing receiver);
  - (42) *SEC v. PrivateFX Global One, Ltd., et al.*, No.H-09-cv-1541, (S.D. Tex. 2009) (Lake, J.) (granting asset freeze and other emergency relief, and appointing receiver);
  - (43) *SEC v. Kiselak Capital Group, et al.*, No. 4:09-cv-256-A (N.D. Tex. 2009) (McBryde, J.) (granting temporary restraining order and other emergency relief);
  - (44) *SEC v. Ponta Negra Fund I, LLC, et al.*, No. A09CA-324-SS (W.D. Tex. 2009) (Sparks, J.) (granting temporary restraining order, order freezing assets and granting other emergency relief);
  - (45) *SEC v. Benny L. Judah and Excel Lease Fund, Inc.*, No. 5:09cv0087-C (N.D. Tex. 2009) (Cummings, J.) (granting agreed order freezing assets and appointing receiver);
  - (46) *SEC v. Oversea Chinese Fund Limited Partnership, et al.*, No. 3:09-cv-0614-B (N.D. Tex. 2009) (Boyle, J.) (granting TRO, asset freeze, receiver, and orders requiring an accounting, preservation of documents, and expedited discovery);
  - (47) *SEC v. Millennium Bank., et al*, No. 7-09-cv-050-O (N.D. Tex. 2009) (O'Connor, J.) (granting TRO, asset freeze, and receiver);
  - (48) *SEC v. Ray M. White., et al*, No. 3-09-cv-0407-K (N.D. Tex. 2009) (Kinkeade, J.) (granting TRO, asset freeze, and receiver);
  - (49) *SEC v. Stanford International Bank, Ltd., et al.*, No. 3:09-cv-0298-N (N.D. Tex. 2009) (Godbey, J.) (granting TRO, asset freeze, receiver, and orders for accounting, preservation of documents, and expedited discovery).
  - (50) *SEC v. Rod Cameron Stringer, et al*, No. 5:09cv0009-C (N.D. Tex. 2009) (Cummings, J.) (appointing receiver);
  - (51) *SEC v. Star Exploration, Inc.*, et al, No. 3:08-cv-2248-O (N.D. Tex. 2008) (O'Connor, J.) (appointing receiver);
  - (52) *SEC v. Delta Onshore Management, LLC, et al*, No. 08-1278-MLB (D. Kan. 2008) (Belot, J.) (granting asset freeze and appointing receiver);

- (53) *SEC v. Patrick Henry Haxton, et al.*, No. 3:08-cv-1467-L (N.D. Tex. 2008) (Lindsay, J.) (granting TRO, asset freeze, and orders requiring accountings; prohibiting document destruction, authorizing expedited discovery, and alternative service);
- (54) *SEC v. W Financial Group, LLC, et al.*, No. 3:08-cv-499-N (N.D. Tex. 2008) (Godbey, J.) (granting TRO, asset freeze, and other emergency orders);
- (55) *SEC v. McNaul, II, et al.*, No.08-1159-JTM (D. Kan. 2008) (Marten, J.) (granting asset freeze, appointing receiver, and requiring preservation of documents);
- (56) *SEC v. T-Bar Resources, LLC, et al.*, No. 3-07-cv-1994 (N.D. Tex. 2007) (Boyle, J.) (granting preliminary injunction, asset freeze, and appointment of receiver);
- (57) *SEC v. Terax Energy, Inc.*, No. 3-07-cv-1554 (N.D. Tex. 2007) (Lynn, J.) (granting TRO, asset freeze, receiver, and other ancillary relief);
- (58) *SEC v. Roberts, et al.*, No. 4:07-cv-786-JLH (E.D. Ark. 2007) (Holmes, J.) (granting preliminary injunction, asset freeze, and orders requiring an accounting and document preservation);
- (59) *SEC v. AmeriFirst Funding, et al.*, No. 3-07-cv-1188 (N.D. Tex. 2007) (Fitzwater, C.J.) (granting TRO, asset freeze, receiver, and other ancillary orders);
- (60) *SEC v. Longs, et al.*, No. 4-07-cv-537-SWW (E.D. Ark. 2007) (Wrights, S.) (agreed order of preliminary injunction, order freezing assets, requiring an accounting, requiring repatriation of assets, and requiring preservation of documents);
- (61) *SEC v. One or More Unknown Purchasers of Call Options for the Common Stock of TXU Corp, et al.*, No. 01-07-cv-1208 (N.D. Tex. 2007) (Lindberg, J.) (granting TRO and asset freeze);
- (62) *SEC v. ABC Viaticals, et al.*, No. 3-06-cv-2136-P (N.D. Tex. 2006) (Solis, J.) (granting TRO and appointing receiver);
- (63) *SEC v. Seaforth Meridian, LTD., et al.* (No. 06-4107-RDR) (D. Kan. 2006) (granting ex parte asset freeze, receiver, and orders requiring repatriation of assets, authorizing expedited discovery, requiring preservation of documents);
- (64) *SEC v. Integrated Equities, Inc., et al.*, No. 2:06-cv-00779-RCJ-GWF (D. Nev. 2006) (Jones, J.) (granting preliminary injunctions and order appointing receiver);
- (65) *SEC v. Sunray Oil Company, Inc., et al.*, No. 3:06-cv-1097-R (N.D. Tex. 2006) (Buchmeyer, J.) (granting TRO, asset freeze, and receiver);
- (66) *SEC v. EFS, LLC, et al.*, No. 3:06-cv-0793-M (N.D. Tex. 2006) (Sanders, J.) (granting ex parte TRO, asset freeze, and receiver);
- (67) *SEC v. ATM Alliance Corp. et al.*, No. A-05-CA-190-LY (W.D. Tex. 2005) (granting ex parte TRO, asset freeze, and receiver);
- (68) *SEC v. Travis Correll, et al.*, No. 4:05-cv-472 (E.D. Tex. 2005) (Schell, J.) (granting ex parte TRO, asset freeze, and receiver);
- (69) *SEC v. Allixon International Corp., et al.*, No. 3:05-cv-2260-P (N.D. Tex. 2005) (Godbey, J.) (granting asset freeze);
- (70) *SEC v. Nelson, et al.*, No. 5:05-cv-0266-C (N.D. Tex. 2005) (Cummings, J.) (granting ex parte order freezing assets and order appointing temporary receiver);
- (71) *SEC v. Megafund, Inc.*, No. 3:05-cv-1328-L (N.D. Tex. 2005) (Lindsey, J.) (granting ex parte TRO, asset freeze, and receiver);
- (72) *SEC v. David Tanner*, No. 05-4057-SAC (D. Kan. 2005) (Crow, J.) (granting ex parte TRO and asset freeze);



- (73) *SEC v. Philip D. Phillip*, No. 2-05-cv-107-J (N.D. Tex. 2005) (Robinson, J.) (granting temporary restraining order and order freezing assets);
- (74) *SEC v. Jack A. Brown*, No. 6:04-cv-537 (E.D. Tex. 2004) (Schneider, J.) (granting ex parte asset freeze order and order appointing receiver);
- (75) *SEC v. Kaye*, No. 04-1275-MLB (D. Kan. 2004) (Belot, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver);
- (76) *SEC v. Kings Real Estate Inv. Trust*, No. 5:04-04006-RDR-KGS (D. Kan. 2004) (Rogers, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver);
- (77) *SEC v. Cash Link Systems Inc.*, No. 3-04-cv-1573-L (N.D. Tex. 2004) (Lindsay, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver);
- (78) *SEC v. Levy*, No. 304-CV- 00351-N (N.D. Tex. 2004) (Godbey, J.) (granting asset freeze);
- (79) *SEC v. Montana*, No. CIV-04-542 (S.D. Tex. 2004) (Kent, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver);
- (80) *SEC v. Holt*, No. No. CIV-03-1825 (D. Ariz. 2003) (Rosenblatt, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver);
- (81) *SEC v. Henderson*, No. 3-03-cv-2661-K (N.D. Tex. 2003) (Kinkeade, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver);
- (82) *SEC v. IPIC Int'l, Inc.*, No. 3-03-cv-2781-P (N.D. Tex. 2003) (Solis, J.) (granting an ex parte temporary restraining order, an freezing assets, and an order appointing a temporary receiver);
- (83) *SEC v. Rocky Mountain Energy Corp.*, No. H-03-1133 (S.D. 2003) (Lake, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver);
- (84) *SEC v. United States Reservation Bank and Trust*, No. CIV-02-0581 (D. Ariz. 2002) (Carroll, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver);
- (85) *SEC v. Southmark Advisory, Inc.*, No. 02CV-830E-(M) (N.D. Okla. 2002) (Ellison, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver);
- (86) *SEC v. Tyler*, No. 3-02-cv-0282-P (N.D. Tex. 2002) (Solis, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver);
- (87) *SEC v. Res. Dev. Int'l, L.L.C.*, No. 3-02-cv-0605-H (N.D. Tex. 2002) (Buchmeyer, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver);
- (88) *SEC v. Dillie*, No. CIV-01-2493 (D. Ariz. 2001) (Teilborg, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver);
- (89) *SEC v. Stroud*, No. CIV-01-999-L (W.D. Okla. 2001) (West, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver);

- (90) *SEC v. English*, No. CIV-01-223-W (W.D. Okla. 2001) (West, J.) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a temporary receiver);
- (91) *SEC v. Hill*, No. 3-01-cv-2189-X (N.D. Tex. 2001) (Fitzwater, J.) (granting an ex parte TRO, asset freeze, and order appointing a receiver);
- (92) *SEC v. C-Tech, L.L.P.*, No. 3-01-cv-2542-P (N.D. Tex. 2001) (Solis, J.) (granting an orders freezing assets and appointing a receiver);
- (93) *SEC v. First Americap Corp.*, No. H-01-1153 (S.D. Tex. 2001) (Buchmeyer, J.) (granting an ex parte TRO and asset freeze);
- (94) *SEC v. Perennial Fund I LP*, No. C00-21181 (N.D. Cal. 2000) (Ware, J.) (granting an ex parte TRO, asset freeze, and an order appointing a temporary receiver);
- (95) *SEC v. Broadband Wireless Int'l Corp.*, No. CIV-00-1375 (W.D. Okla. 2000) (Russell, J.) (granting an ex parte TRO and asset freeze, and an order appointing a temporary receiver);
- (96) *SEC v. Garland*, No. 3-00-cv-1149-X (N.D. Tex. 2000) (Kendall, J.) (granting a TRO and asset freeze);
- (97) *SEC v. New World Web Vision.Com, Inc.*, No. 4-00-cv-0231-Y (N.D. Tex. 2000) (Means, J.) (granting a TRO, asset freeze, and an order appointing a temporary receiver);
- (98) *SEC v. Stadtt Media, L.L.C.*, No. 3-00-cv-1489-P (N.D. Tex. 2000) (granting a TRO and asset freeze, and an order appointing receiver);
- (99) *SEC v. Ellis*, No. 3-00-cv-1040-P (N.D. Tex. 2000) (Solis, J.) (granting an ex parte TRO and asset freeze);
- (100) *SEC v. Le Club Prive, S.A.*, No. 3-00-cv-1851-R (N.D. Tex. 2000) (Buchmeyer, J.) (granting an ex parte TRO, asset freeze, and an order appointing a temporary receiver);
- (101) *SEC v. Houston Texans NFL Football Team Holding Co.*, No. H-00-3072 (S.D. Tex. 2000) (Rainey, J.) (granting an ex parte TRO and asset freeze);
- (102) *SEC v. Oracle Trust Fund*, No. 99-1483-MLB (D. Kan. 1999) (Belot, J.) (granting an ex parte TRO, asset freeze, and an order appointing a receiver);
- (103) *SEC v. Cornerstone Prodigy Group, Inc.*, No. 4-99-cv-0978-Y (N.D. Tex. 1999) (Means, J.) (granting an order freezing assets and an order appointing a receiver);
- (104) *SEC v. Highland Financial Corp.*, No. 4-99-cv-0719-D (N.D. Tex. 1999) (granting an ex parte restraining order, an order freezing assets, and an order appointing a receiver);
- (105) *SEC v. Brooks*, No. 3-99-cv-1326-D (N.D. Tex. 1999) (Fitzwater, J.) (granting an ex parte TRO and asset freeze);
- (106) *SEC v. Redbank Petroleum, Inc.*, No. 3-99-cv-1267-T (N.D. Tex. 1999) (granting an ex parte temporary restraining order, an order freezing assets, and an order appointing a receiver);
- (107) *SEC v. Cook*, No. 3-99-cv-051-X (N.D. Tex. 1999) (Buchmeyer, J.) (granting an ex parte TRO, asset freeze, and an order appointing a temporary receiver);
- (108) *SEC v. Inverworld, Inc.*, No. SA-99-CA-0822-FB (W.D. Tex. 1999) (Biery, J.) (granting an order freezing assets and an order appointing a receiver);
- (109) *SEC v. Great White Marine and Recreation, Inc.*, No. W-99-CA-230 (W.D. Tex. 1999) (Smith, J.) (granting TRO and an order appointing an agent, but refusing to grant an asset freeze order against relief defendant);



- (110) *SEC v. Sunpoint Securities, Inc.*, No. 6-99-Ccv-667 (E.D. Tex. 1999) (Hannah, J.) (granting an ex parte temporary restraining order, asset freeze, and order appointing a receiver);
- (111) *SEC v. American Automation, Inc.*, No. 3-98-cv-1596-D (N.D. Tex. 1998) (Fitzwater, J.) (granting an ex parte TRO and asset freeze); and
- (112) *SEC v. Trinity Gas, Corp.*, et al., No. 4-97-cv-001018 (N.D. Tex. 1997) (Means, J.) (granting TRO, asset freeze, orders for accounting, prohibiting destruction, expedited discovery, and appointing receiver).